

EXHIBIT 2a

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK

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3 UNITED STATES OF AMERICA, 18-CR-538 (MKB)
4 Plaintiff, United States Courthouse
5 -against- March 1, 2022
6 NG CHONG HWA, also known as 9:30 a.m.
7 "Roger Ng",
8 Defendant.

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10 TRANSCRIPT OF CRIMINAL CAUSE FOR TRIAL
11 BEFORE THE HONORABLE MARGO K. BRODIE
12 UNITED STATES CHIEF DISTRICT JUDGE
13 BEFORE A JURY

14 APPEARANCES

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21 BY: MARC A. AGNIFILO, ESQ.
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23 ZACH INTRATER, ESQ.
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25 Proceedings recorded by mechanical stenography. Transcript
produced by computer-aided transcription.

1 Q And you learned about that makeup payment from the
2 defendant?

3 A Yes, Roger had told me.

4 Q Did you have a relationship with Terence Geh like that of
5 the defendant's?

6 A No. Definitely not, sir.

7 I knew Terence, but we never socially mixed or had,
8 you know -- had a friendly relationship that way. No, sir.

9 Q Did you, through Capital Place, ever loan Terence Geh
10 money?

11 A No.

12 Q Now, you have mentioned that you spoke to Jho Low as well
13 about the defendant's detention in Singapore?

14 A Yes, sir.

15 Q And, again, why were you staying in communication with
16 Jho Low about that subject?

17 A Because, again, we shared a concern that Roger had been
18 put in this situation and that he was being questioned about
19 this very scheme that we were trying to hide and that we knew
20 was illegal, so we shared the same concern.

21 I was also trying to see if Jho, in fact, was, you
22 know, making an effort to get Roger out of Singapore and back
23 to Malaysia, which he said he was doing, confirming what Hwee
24 Bin had told me before, that he was speaking to the Prime
25 Minister and the Attorney General to seek his release.

1 Q You mentioned that in your discussions with Hwee Bin that
2 you had talked about not communicating with the defendant
3 directly anymore?

4 A Yes.

5 Q What did you mean by that?

6 A Hwee Bin was afraid, and I shared that concern too, that
7 as Roger was being investigated in Singapore that his phone
8 was no longer secure in terms of communicating on that phone,
9 meaning that he would either be listened to or any messages
10 going to him would be received by the authorities there. So
11 it was my understanding from her, and I shared that, that that
12 phone was no longer secure to communicate with Roger.

13 Q So how were you supposed to communicate? Was there any
14 understanding about that?

15 A Yes, through her.

16 Q Through Hwee Bin?

17 A That's correct.

18 Q And how would you communicate through Hwee Bin?

19 A We would speak numerous times.

20 We essentially had a practice to be -- to use
21 WeChat, which is the Chinese version of WhatsApp, or a
22 communication app on the phone, and we thought that was at
23 least a step removed from any other authorities around the
24 world and that China would probably be a safe bet with WeChat.
25 So we stuck to WeChat at that time.

1 Q Do you remember what your chat names were for each other?

2 A Mine was Forza with a Z, and her's was Morning Dew, I
3 believe.

4 Q And did you communicate with Hwee Bin at the morning dew
5 WeChat?

6 A Yes. We started communicating quite frequently, yes.

7 Q For WeChat, you can text message?

8 A Yes.

9 Q Can you also make phone calls?

10 A Yes, phone and video calls. It's really similar to what
11 we know as WhatsApp here mostly.

12 Q And how -- what method of communication were you using to
13 talk to Jho Low during that time?

14 A The same. We had switched from Blackberry messengers to
15 WeChat around about the same time.

16 Q And what were the reasons for going to WeChat?

17 You talked about security around the Blackberry.
18 Did you understand there was a security aspect to WeChat.

19 A Yeah. The same thing, we thought that, you know, WeChat
20 being owned by a Chinese company called Tencent, we thought it
21 was safer, away from the authorities, like in America or
22 Singapore, that we understood were investigating us.

23 Q If you could turn to tab 136A in your binder. It's
24 Government Exhibit 2602-C-1 for identification.

25 Do you see that, sir.

1 A Yes, sir.

2 Q What do you recognize the document to be?

3 A It's -- it's that WeChat exchange which I am on.

4 MR. ROLLE: Your Honor, we would offer Government
5 Exhibit 2602-C-1.

6 MR. AGNIFILO: One second, Your Honor.

7 THE COURT: Mr. Rolle, I assume you're offering it
8 as redacted?

9 MR. ROLLE: Yes, Your Honor.

10 THE COURT: Is there any objection?

11 MR. AGNIFILO: There is not an objection. I think
12 there is some confusion as to numbers that we're working on.

13 We have no objection. I think that might change the
14 number at some point.

15 MR. ROLLE: Judge, it's marked on the screen as
16 2601-C-1, but it's actually being offered as 2602, so we will
17 correct the exhibit stamp on this document, but we would offer
18 it in its redacted form at this time.

19 MR. AGNIFILO: And we do not object.

20 THE COURT: It is admitted.

21 (Government Exhibit 2602, was received in evidence.)

22 Q Mr. Leissner, you said you recognize this as a WeChat?

23 A That's right, sir.

24 Q And there is something that says participants?

25 A Yes.

1 Q The third line from the top?

2 A That's right.

3 Q It is a series of letters and then it says Forza Inter?

4 A That was my WeChat name.

5 Q That's you?

6 A That's right.

7 Q And then another similar series of letters and numbers.

8 And then it says Super Energizer Bunzzz with three Z's?

9 A Yes.

10 Q Who's that?

11 A That's Jho Low.

12 Q And there's a series of messages after that?

13 A Yes, sir.

14 Q The date of the first message below that, it's from Jho
15 Low?

16 A Yes, that's correct.

17 Q What's the date?

18 A It is 31st of October, 2017.

19 Q Jho Low says, "Can't talk"?

20 A Yes.

21 Q And then the next message is also from Jho Low?

22 A Yes.

23 Q "Call when up"?

24 A That's right.

25 Q Then the following message is also from Jho Low?

1 A Yes.

2 Q What's the date of that message?

3 A It is the 1st of November, 2017.

4 Q Could you read the message Jho Low sent to you on
5 November 1, 2017?

6 A Yes.

7 "After 77 days of Singapore CAD holding on to Roger
8 Ng, Malaysian, former Goldman Sachs, passport allowing him
9 freedom of movement in Singapore but not allowed to leave
10 Singapore. Roger Ng went to court to demand back his passport
11 that Singapore CAD was being unreasonable."

12 Q And just to orient us, what is Jho Low reporting to you
13 in this message?

14 A He's basically referring to the detention of Roger in
15 Singapore with his passport being taken away.

16 Q The incident you just talked about?

17 A That's right. Correct.

18 Q And did you have an understanding as to why Jho Low was
19 sending you an update on the defendant's detention in
20 Singapore?

21 A Because I had communicated with him and asked him
22 questions around this, so had Hwee Bin. We all, three of us,
23 shared our grave concerns that Roger was in custody,
24 effectively in Singapore, or at least could not leave the
25 country and was being interviewed by the police and the

1 authorities.

2 Q What was reported in the fourth line, fourth item in Jho
3 Low's message?

4 A "They came but he was in meeting with BSI banker, Yak Yew
5 Chee, Tim Leissner and JL, in discussions on Aabar."

6 Q And BSI was the bank you testified about last week?

7 A That's right. Correct.

8 Q The bank that would receive the money in connection with
9 the scheme, you understood?

10 A That's right.

11 Q And the bank that you, the defendant and Jho Low went to
12 a meeting?

13 A Well, yes. Roger and I went to that meeting in Singapore
14 for that lunch that I had described last week. Jho Low was
15 not in attendance at that lunch, but he had briefed us just
16 before the lunch about what we were expected to say and
17 present.

18 Q He was in that separate room?

19 A Correct.

20 Q In the restaurant?

21 A Uh-hum.

22 Q And if we could read -- if you could read the last
23 portion after the fifth item, what Jho Low was reporting to
24 you?

25 A "Looks like SG" -- that stands for Singapore -- "is still

1 going full force. Not sure if as result of AG statement" --
2 AG, Attorney General statement -- "that 1MDB investigations
3 still ongoing."

4 "Today, SG" -- Singapore -- "also announced further
5 prohibitions on individuals involved in 1MDB breaches."

6 Q Do you recall what your reaction was to receiving this
7 kind of information about the defendant's detention in
8 Singapore and the status?

9 A Yes, sir. It was -- it continued to be great concern
10 that these investigations weren't stopping, they were
11 intensifying in nature, and now one of us who were part of the
12 scheme from the London meeting onwards was, in fact, detained
13 by one of the authorities. That's a big shift. That's a big
14 change and caused me great concern at the time about what
15 might happen to me as well, especially, also, because I was in
16 the U.S. with my family and also traveling around the world.

17 So, yeah, it gave me a pause to think what my
18 situation would be.

19 Q And by this point, you said November 2017, you had been
20 under subpoena in the United States since 2016?

21 A Correct.

22 Q But had you ever had to sit down or be interviewed or
23 questioned at any point after receiving that subpoena by any
24 authorities?

25 A I personally had never been interviewed. There was a

1 meeting that one of my lawyers -- it was in Los Angeles -- had
2 with the Department of Justice, but I personally had never
3 been interviewed. That's correct.

4 Q So when the defendant was detained in Singapore, was that
5 the first time that you understood someone was being asked
6 questions directly about the criminal scheme?

7 A Yes. That was the first time I had seen it firsthand
8 that somebody of this -- of the inner circle, if you were, had
9 been arrested or detained.

10 Q And if you could turn to tab 136 B, Government Exhibit
11 2602-C-2 for identification.

12 Do you recognize that document.

13 A Yes, sir. That's, again, a WeChat exchange.

14 Q Were you part of the WeChat exchange in this exhibit?

15 A Yes, sir.

16 MR. ROLLE: We would offer Government Exhibit
17 2602-C-2 Your Honor.

18 MR. AGNIFILO: No objection, Your Honor.

19 THE COURT: It's admitted.

20 (Government Exhibit 2602-C-2, was received in
21 evidence.)

22 Q Who is this WeChat exchange between, you and who else?

23 A It's me, Forza Inter, and Morning Dew is Hwee Bin.

24 Q Morning Dew was Hwee Bin?

25 A That's right.

EXHIBIT 2b

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	18-CR-00583(MKB)
	:	
-against-	:	
	:	
	:	United States Courthouse
NG CHONG HWA, also known as	:	Brooklyn, New York
"Roger Ng,"	:	
	:	
Defendant.	:	Tuesday, March 8, 2022
	:	9:30 a.m.
	:	

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TRANSCRIPT OF CRIMINAL CAUSE FOR JURY TRIAL
BEFORE THE HONORABLE MARGO K. BRODIE
United States CHIEF DISTRICT JUDGE

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*Proceedings recorded by mechanical stenography, transcript
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A P P E A R A N C E S: (Continued)

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1 interest payment on a 1MDB bond?

2 A Yes, he told me that it was the case, yes.

3 Q Okay. Now, the 145 million euros was in euros and not in
4 dollars because you knew that Low wanted to avoid the U.S.
5 banking system?

6 A That was my understanding from him, yes.

7 Q And he told you that specifically, correct?

8 A Yes.

9 Q All right. He said that he was -- he didn't want to do
10 transactions in dollars because he was concerned about United
11 States law enforcement, right?

12 A Yes, he was concerned about the Federal Reserve Bank, in
13 particular.

14 Q Okay. And is it your understanding that the reason this,
15 the 145 million was in euros was because Low didn't want to
16 deal in dollars?

17 A That's right, correct.

18 Q So you took 145 million euro into Midas, your shell
19 company from the Seychelles that had a bank in the Bahamas,
20 right?

21 A Yes.

22 Q Now, as of May 2017, you transferred your interest in
23 Midas to Kimora Lee Simmons-Leissner, correct?

24 A As I described it, beneficially.

25 Q Beneficially. All right. And this 145 million euro,

1 that was Midas' only money?

2 A Yes.

3 Q Because Midas didn't do any business, correct?

4 A Correct.

5 Q And Midas at your direction moved money to many different
6 other locations and many other different transactions,
7 correct?

8 A That's correct.

9 Q And you used fake contracts to paper over these
10 transactions?

11 A That's correct again, yes.

12 Q And you used fake contracts that were drafted by this
13 lawyer in Mauritius, Mitch Barrett?

14 A No, I think they were drafted by Jho and other persons.

15 Q So Mitch Barrett didn't draft any of those?

16 A No.

17 Q They were drafted by Low and who else?

18 A I don't know who else, but Jho had the blueprint for
19 these.

20 Q And there's a fake contract to paper over the transfer
21 that was supposedly from the Kuwaiti sheikh to Midas?

22 A That's correct.

23 Q And this fake contract was a product supply agreement
24 where supposedly Midas was selling steel and something called
25 bitumen to the Kuwaiti sheikh's company?

1 A That's correct.

2 Q But this was, this was all fake; Midas didn't have any
3 steel business or bitumen business, right?

4 A That's correct, yes.

5 Q Okay. And then you and Kimora Lee Simmons directed tens
6 of millions of dollars into investments, correct?

7 A No, she never did that. I did.

8 Q You did that?

9 A Yes.

10 Q You put money back into a company called Baby Phat?

11 A That's correct.

12 Q What company was that?

13 A That's the company that my wife used to own and I bought
14 back 70 percent of it.

15 Q You put money into a volleyball league called AVP?

16 A That's correct.

17 Q You put money into an insurance company called
18 Friendsurance?

19 A Yes, but not from that money, sir.

20 Q What money went into Friendsurance?

21 A That was done in 2013 so I don't recall which bonds were
22 used for that.

23 Q You put money into a cannabis company called PureForm?

24 A Yes, sir.

25 Q And did you put money into Capital Place Holdings?

1 A Yes. -- no, sorry, I don't think so, sir. I don't
2 recall that. Capital Place Holdings?

3 Q Yes.

4 A I don't recall that.

5 Q All right. And you bought through Keyway Pride, the
6 shell company owned by Kimora, a \$25 million mansion in
7 Beverly Hills, right?

8 A That was bought from Keyway Pride, yes.

9 Q So the -- so Keyway Pride actually bought the \$25 million
10 home in Beverly Hills, right?

11 A That's correct.

12 Q And this was with money that was Low's money?

13 A Again, you're making that assumption. I described how
14 that fund flow worked and I had my suspicions but we had that
15 discussion about where the money came from.

16 Q And your suspicion is that that house in Beverly Hills
17 was Low's money?

18 A Yes.

19 Q Because you had no reason to think that Sheikh Sabah
20 would give you a dime, do you?

21 A Yes. There was no other business contact with him.

22 Q And the FBI and the Department of Justice, they let you
23 live in that mansion after your arrest, right?

24 A Yes, I lived there.

25 Q They let you keep the mansion, right?

1 A They haven't forfeited that mansion.

2 Q They didn't forfeit it, right?

3 As you sit here today, it's still not forfeited,
4 right?

5 A That's correct.

6 Q And then you directed more than 15 million euro in at
7 least five different transactions to another Keyway Pride
8 limited company, this one owned by Judy?

9 A No, sir. I don't recall that, no.

10 Q Was there a second Keyway Pride?

11 A There was a Keyway Pride in Hong Kong, yes.

12 Q Was there a Keyway Pride that was incorporated in the
13 British Virgin Islands?

14 A Yes.

15 Q And who owned that company?

16 A Judy did.

17 Q And did you, did you direct more than 15 million euro to
18 move from Midas to the Keyway Pride BVI company owned by Judy?

19 A No, sir, I don't recall that.

20 Q Now, everything that you would have moved from Midas came
21 from the same source, right?

22 A Correct.

23 Q Now, you testified, I think, on direct examination that
24 you ended up with about 80 million of Jho Low's money from
25 these transactions -- well, let me back up.

1 You ended up with \$80 million from these
2 transactions, correct?

3 A That statement is correct, yes.

4 Q And of -- you used 25 million on the Beverly Hills house,
5 right?

6 A That's right.

7 Q Okay. You made investments of various businesses,
8 correct?

9 A Yes, sir.

10 By the way, that money is to be repaid is my
11 understanding.

12 Q To be repaid?

13 A Yes.

14 Q To be repaid to who and when?

15 A The agree -- well, to the sheikh.

16 Q To the sheikh?

17 A Yes.

18 Q So you think the sheikh is waiting on this money from
19 you?

20 A There was an arbitration request for that money, yes.

21 Q And where is the money?

22 A It's as you described it just now, made into, put into
23 investments.

24 Q Do you have any intent to pay the sheikh the money?

25 A Well, it has to be -- it can only be done once assets are

1 sold and, two, as the resolution worked with my lawyers with
2 any of these matters that I talked about here.

3 Q So as you sit here today, you fully intend to do what you
4 need to do to pay the sheikh back his money?

5 A I would be guided by my lawyers, sir.

6 (Continued on next page.)

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1 THE COURT: Mr. Agnifilo, are we going to break for
2 lunch?

3 MR. AGNIFILO: Yes, we can stop for lunch.

4 THE COURT: Ladies and gentlemen, please do not
5 discuss the case. Please enjoy your lunch. Please be back at
6 a quarter to 2.

7 (Jury exits.)

8 THE COURT: You may be seated.

9 Mr. Agnifilo, I just wanted a sense of how much
10 longer you're going to be.

11 MR. AGNIFILO: I'm going to really try hard to
12 finish today and not speak too fast while I'm doing it but I'm
13 going to try very hard to finish today.

14 THE COURT: I was hoping you would finish and we
15 would have some other testimony today.

16 MR. AGNIFILO: I know, I know, Judge.

17 THE COURT: Okay. All right. I'll see the parties
18 back at a quarter to 2.

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1 AFTERNOON SESSION

2 (In open court; jury present.)

3 THE COURT: Please be seated.

4 I hope you enjoyed your lunch.

5 Mr. Agnifilo?

6 MR. AGNIFILO: Yes. Thank you, Judge.

7 (The witness, TIM LEISSNER, resumed the stand.)

8 CROSS-EXAMINATION

9 BY MR. AGNIFILO:

10 Q Good afternoon, Mr. Leissner.

11 A Good afternoon.

12 Q Do you know someone named Ghanim bin Sayed?

13 A Ghanim Al Sayed, yes.

14 Q And who is -- it's GHI -- I just want to make sure we're
15 talking about the same person, G-H-I-N-A-M, bin Sayed?16 A No, I don't think that's correct. I think you're talking
17 about Ghanim, G-H-A-N-I-M?

18 Q That's right.

19 A Al Sayed?

20 Q Yes, that's exactly. Who is that?

21 A He is a business partner of mine that I had known for a
22 few years.

23 Q Okay. And is he from Kuwait?

24 A No. He's from Qatar.

25 Q From Qatar? Okay. And at some point, you were going to

1 try and transfer assets out of Kimora's name to Ghanim bin
2 Sayed?

3 A Ghanim Al Sayed, yes.

4 Q Tell us what you were going to do.

5 A The intention was to effectively sell the holding
6 companies that owned the assets that I had funded over the
7 years to him or to one of his Hong Kong entities for
8 consideration, meaning for money. That was the basic idea,
9 yes.

10 Q And Ghanim -- is that how I say his name?

11 A Yes.

12 Q And Ghanim was business partners with someone named
13 Sheikh Hamad bin Khalifa Al Thani?

14 A Yes.

15 Q Former Prime Minister of Qatar?

16 A That's correct as well.

17 Q And Ghanim had an entity called Newland Limited?

18 A That's correct.

19 Q What was Newland Limited, what was it?

20 A As far as I understand, it was just a holding company
21 that was going to hold these assets that I was going to
22 transfer into it.

23 Q Tell me if this is right: You and Kimora decided that
24 she was going to sell her rights to all of the investments
25 that you made, including the Keyway Pride California which

1 owned the \$25 million Beverly Hills house, to Ghanim for
2 \$170 million?

3 A It wasn't she and her. I had worked on that transaction,
4 sir. I had put this together, but I mean, essentially, yes,
5 it was involving all the assets I had funded over the years
6 into Newland in Hong Kong.

7 Q And this was all to get the assets away from the United
8 States?

9 A There were several considerations. One, of course, was
10 what you described as being a, an asset protection. The way
11 that you described it doesn't actually work. The assets were
12 in the United States so the assets don't move. The ownership
13 was transferred offshore or the intention was that the
14 ownership was being transferred offshore. The assets
15 themselves stay where they are.

16 Q In May of 2018, did you and Kimora go, were you in
17 Switzerland?

18 A Yes, sir.

19 Q And at the time, were you researching banks in
20 Liechtenstein?

21 A That's correct as well, yes.

22 Q And why were you researching banks in Lichtenstein in May
23 of 2018?

24 A To hold the consideration that if Newland was actually
25 buying those assets from me, that the consideration could be

1 invested in Liechtenstein.

2 Q Okay. And the advantages of being investigated in
3 Liechtenstein is that you would do it in a trust? How would
4 you do it?

5 A Many different ways. Trust is one way of doing it, yes.

6 Q How were you thinking about doing it?

7 A It was potentially a trust. We never got there at the
8 end in our discussions but a trust was one of the
9 considerations.

10 Q Okay. And do you remember doing -- you checked, you did
11 Google research on or about May 17, 2018 into a bank called
12 LGT Bank Qatar, do you remember doing that?

13 A What's the bank's name?

14 Q LGT Bank in Qatar.

15 A Maybe so. I can't remember that.

16 Q Okay. Do you know --

17 A LGT is a Liechtenstein bank, not a Qatari bank.

18 Q LGT is a bank that's controlled by the Principality of
19 Liechtenstein, correct?

20 A That's my understanding, yes.

21 Q And you were doing research on LGT Bank in Liechtenstein,
22 correct?

23 A I don't remember doing that research, sir.

24 Q Okay. Let me show you -- hold on. Just for
25 identification, it's Defense Exhibit 97.

1 I'm just going to ask you to look at the second page
2 there.

3 (Pause.)

4 Q So the only question is -- take a look at it.

5 A Yes, sir.

6 Q All right. So the question is only -- so I asked you if
7 you remembered doing internet research or Google research off
8 your phone into LGT Qatar and you said you didn't remember?

9 A Yes.

10 Q Okay. Does that refresh your recollection one way or the
11 other?

12 A I'm sorry, sir, no.

13 Q All right. No problem. Well, while you have it, hold on
14 for a second.

15 A Yes.

16 Q Do you remember doing research into different
17 Liechtenstein banks?

18 In other words, you were just looking at what banks,
19 what options do I have in Liechtenstein by way of banks?

20 A Yes.

21 Q Okay. What do you remember researching about that?

22 A First of all, which banks were available in Liechtenstein
23 and just informing myself about them because I actually had
24 never done business there so I was just trying to get a
25 general education who's in Liechtenstein, you know, and who,

1 are they big, small, what are they known for, et cetera, more
2 general research really.

3 Q And why Liechtenstein of all countries?

4 A It was one of those countries that I felt was a safe
5 place for that cash to go especially in a trust form.

6 Q And without getting too much into the details, they have
7 a tradition of bank secrecy?

8 A Yes, a fairly good tradition.

9 Q Okay. And what do you mean by a good tradition? It's a
10 rigorous bank secrecy tradition, correct?

11 A That's right.

12 Q Meaning that the banks can't tell people outside the bank
13 about their customers?

14 A I'm sure that's a very big oversimplification. It is a
15 very sound system of bank secrecy. I don't know sitting here
16 today the exact rules that would apply for international
17 inquiries or the like, but in terms of jurisdictions, it's
18 certainly one of those that is better known for its secrecy.

19 Q Okay. So you didn't want a bank in the United States. A
20 bank in the United States would do you no good in this regard.

21 A Again, the intention was not to have it in the United
22 States, yes.

23 Q Right. Right. And you didn't even opt for a bank in
24 Switzerland which also has a tradition of bank secrecy, am I
25 right?

1 A It does, yes.

2 Q You opted for Liechtenstein and is that because you
3 thought Liechtenstein had greater bank secrecy even than
4 Switzerland?

5 A Yes, I believe so.

6 Q Okay. I can take that from you.

7 Now, did you and Kimora actually travel to
8 Liechtenstein?

9 A Yes, we did.

10 Q Okay. And you went to Vaduz, the capital?

11 A Yes.

12 Q And what did you and Kimora do when you were in Vaduz,
13 Liechtenstein?

14 A We met with lawyers and potential trust companies or
15 trustees in the country and I think we also met with one or
16 two banks.

17 Q Okay. And what exactly was the plan? What were you
18 going to do in Liechtenstein, you and Kimora?

19 A Well, sorry, what were we going to do in Liechtenstein?
20 You mean, post those meetings?

21 Q Yes. You're having meetings with lawyers and banks and
22 all of that.

23 A Right.

24 Q What's the plan?

25 A Well, the intention was that if we were to get this

1 consideration from Newland as part of the transaction that we
2 described earlier, that either all or part of that money could
3 be invested with one of the banks in Liechtenstein.

4 Q And do you recall how long you and Kimora were in
5 Liechtenstein?

6 A One day.

7 Q And how much money were you planning on putting in this
8 trust structure or whatever structure was going to be in
9 Liechtenstein? How much money are we talking about?

10 A I think 140, \$150 million.

11 Q And where was that money at the moment? In other words,
12 when you and Kimora went to Liechtenstein, where was the
13 money?

14 A It was still in the assets that we talked about
15 transferring or selling to Newland. So the money was nowhere.
16 It was only the assets.

17 Q It was in assets?

18 A That's correct.

19 Q You would have to sell the assets?

20 A That was the intention.

21 Q Okay. And then pool together all the money?

22 A That's right.

23 Q And then put it in a bank in Liechtenstein?

24 A That's correct.

25 Q Now, you didn't tell the FBI anything about what you just